

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**MICHAEL ALEXANDER BROWN**

)  
)  
) **Case Nos. 7:19-MJ-00145**  
)  
)

**MOTION TO DISMISS CRIMINAL COMPLAINT**

The United States Attorney for the Western District of Virginia, by First Assistant United States Attorney Daniel P. Bubar, moves to dismiss the Criminal Complaint against MICHAEL ALEXANDER BROWN, filed on November 13, 2019, charging BROWN with unlawful flight to avoid prosecution.

BROWN was arrested on November 27, 2019 by law enforcement officers in Franklin County, and is in their custody to face state charges.

WHEREFORE, the United States requests that the Criminal Complaint filed against MICHAEL ALEXANDER BROWN on November 13, 2019 be dismissed.

Respectfully submitted,

THOMAS T CULLEN  
United States Attorney

s/ Daniel P. Bubar  
First Assistant United States Attorney  
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**CERTIFICATE OF SERVICE**

I hereby certify that on November 27, 2019, I electronically filed the foregoing Motion to Dismiss Criminal Complaint with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record.

s/ Daniel P. Bubar  
First Assistant United States Attorney  
IL State Bar No. 6282587